

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN)
---	-----------------------

This document relates to:

Estate of John Patrick O'Neill, Sr., et al. v. The Republic of Iraq, et al., No. 1:04-cv-01076 (GBD)(SN)

Estate of John P. O'Neill, Sr., et al. v. Al Baraka Investments & Development Corp., et al., No. 1:04-cv-01923 (GBD)(SN)

Susan M. King, et al. v. Islamic Republic of Iran, No. 1:22-cv-05193 (GBD)(SN)

**MOTION TO SUBSTITUTE PARTIES PURSUANT TO
FEDERAL RULE OF CIVIL PROCEDURE 15(d)**

Pursuant to Federal Rules of Civil Procedure 15(d), Plaintiffs herein move the Court to allow substitution of the party as identified in Exhibit A in the above referenced actions. The individual being substituted into the case is the Personal Representative of an individual killed as a result of the terrorist attacks on September 11, 2001.

Exhibit A identifies the individual to be substituted in the pleadings, including the capacity in which they seek to be substituted, state of residency at the time the complaint was filed, the existing pleading that refers to the plaintiff, and the decedent of which the plaintiff is the Personal Representative.

Plaintiffs propose that, upon endorsement of Plaintiffs' Proposed Order, the substituted parties be individually entered as Plaintiffs into the Court's ECF system to ease the burden on the Clerk of the Court's Office and the size of this MDL.

Dated: November 5, 2024

/s/ Jerry S. Goldman

Jerry S. Goldman, Esq.

Bruce E. Strong, Esq.

Alexander Greene, Esq.

ANDERSON KILL P.C.

1251 Avenue of the Americas

New York, NY 10020

Tel: (212) 278-1000

Fax: (212) 278-1733

Email: jgoldman@andersonkill.com

bstrong@andersonkill.com

agreene@andersonkill.com

EXHIBIT A to Motion to Substitute Party

	Previous Personal Representative:	Case Number:	Substituted Personal Representative:	State of Residency of Substituted Personal Representative at Filing:	Decedent's Name:
1.	Vera Schleeter as the Personal Representative of the Estate of Kip P. Taylor, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Kip P. Taylor	No. 1:04-cv-01076 (GBD) (SN); No. 1:04-cv-01923 (GBD) (SN); No. 1:22-cv-05193 (GBD)(SN)	Dean Taylor as the Personal Representative of the Estate of Kip P. Taylor, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Kip P. Taylor	CO	Kip P. Taylor